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9 Attorneys for Plaintiff Manuel L. Garcia

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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 MANUEL L. GARCIA,)	Case No.: 2:18-cv-02226-JCM-GWF
14)	
15 Plaintiff,)	STIPULATION TO EXTEND TIME
16 vs.)	OF TIME TO FILE MOTION FOR
)	REMAND/REVERSAL
17 NANCY A. BERRYHILL, Acting)	(FIRST REQUEST)
18 Commissioner of Social Security,)	
19 Defendant.)	

20 Plaintiff Manuel L. Garcia and Defendant Nancy A. Berryhill, Acting
21 Commissioner of Social Security, through their undersigned attorneys, stipulate,
22 subject to this court's approval, to extend the time from May 2, 2019, to May 31,
23 2019, for Plaintiff to send his Motion for Remand/Reversal with all other dates in
24 the Court's Scheduling Order extended accordingly. This is Plaintiff's first request
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1 for an extension. This request is made at the request of Plaintiff's counsel to allow
2 additional time to fully research the issues presented.

3 Plaintiff's counsel currently has three motions due the week this motion is
4 due. Counsel has at least one District Court motion due each week until May 31,
5 in addition to it seven reply briefs, and 11 Appeals Council briefs. Council will
6 also be taking a pre-planned leave one-week prior to the proposed due date. Also,
7 in May, plaintiff's counsel also has three out of county hearings requiring
8 significant travel time. An extension to May 31, 2019, will allow counsel to fully
9 research the issues presented.

10 DATE: April 26, 2019

Respectfully submitted,

11 LAW OFFICES OF LAWRENCE D. ROHLFING

12 /s/ / *Cyrus Safa*

13 BY: _____

Cyrus Safa

14 Attorney for plaintiff Manuel L. Garcia

15 DATE: April 26, 2019

NICHOLAS A. TRUTANICH

16 United States Attorney

17 /s/ Gina Tomaselli

18 BY: _____

19 Gina Tomaselli

20 Special Assistant United States Attorney

21 Attorneys for defendant Nancy A. Berryhill

Acting Commissioner of Social Security

22 |*authorized by e-mail|

23
24 DATED:

25 IT IS SO ORDERED:

26 UNITED STATES MAGISTRATE JUDGE

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I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Cyrus Sava
Attorneys for Plaintiff

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9 Attorneys for Plaintiff Manuel L. Garcia
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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15	MANUEL L. GARCIA)	Case No.: 2:18-cv-02226-JCM-GWF
16)	
17	Plaintiff,)	PROPOSED ORDER EXTENDING
18	v.)	BRIEFING SCHEDULE
19	NANCY A. BERRYHILL, Acting)	
20	Commissioner of Social Security,)	
21)	
22	Defendant.)	

23 Based upon the stipulation of the parties, and for cause shown,

24 IT IS HEREBY ORDERED, that Plaintiff shall have an extension of time, to
25 and include May 31, 2019, in which to file Plaintiff's MOTION FOR REVERSAL
26 AND/OR REMAND; and that all other deadlines set forth in the April 1, 2019

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1 Case Management Order shall be extended accordingly. IT IS SO ORDERED.

2 DATE : 4/30/2019

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THE HONORABLE GEORGE FOLEY
4 UNITED STATES MAGISTRATE JUDGE
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1 Respectfully submitted,

2 LAW OFFICES OF Lawrence D. Rohlring

3 */s/ Cyrus Safa*

4 BY: _____
5 Cyrus Safa
6 Attorney for plaintiff
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